



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

DEC 11 2012

REPLY TO THE ATTENTION OF:

Andrew Stewart  
Chief  
Permits and Stationary Source Modeling Section  
Bureau of Air Management  
Wisconsin Department of Natural Resources  
PO Box 7921  
Madison, Wisconsin 53707-7921

Dear Mr. Stewart:

The U.S. Environmental Protection Agency has the following comments on the Wisconsin Department of Natural Resources' draft of the Prevention of Significant Deterioration (PSD) Permit for Waupaca Foundry, Inc-Plants 2/3. The draft permit is being proposed as a PSD permit (#12-POY-127) and a Title V permit revision (#469033840-P13). The permit pertains to the installation of a thermal sand reclaimer and the modification of the Line 7 casting, pouring, cooling, and shakeout operation.

In order to ensure that the project meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis for the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comment.

Page 8 of the Preliminary Determination document provides the total increase of Carbon Dioxide (CO<sub>2</sub>) emissions from the projects and determines it is less than the 75,000 tons per year (tpy) PSD significance level. However, since the regulated New Source Review pollutant is defined as Greenhouse Gases (GHGs), the GHG emission increase should account for not only CO<sub>2</sub>, but for all of the GHGs that are emitted. Please provide the total increase of GHG in terms of Carbon Dioxide-Equivalent. If the total increase of GHG emissions is greater than the 75,000 tpy PSD significance level please conduct a PSD Best Available Control Technology (BACT) analysis and incorporate the selected BACT into the permit.

We look forward to working with you to address all of our comments. If you have any further questions, please feel free to contact Andrea Morgan, of my staff, at (312) 353-6058.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico".

Genevieve Damico  
Chief  
Air Permits Section